# **EXHIBIT** A

#### 

From: Christopher Zambri </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS

/CN=F72E8103D1E046BB877103A8D926EFCD-SCHG7VW6>

To: Donna Heinel

CC: Pat Haden; Steve Lopes Sent: 4/22/2014 4:10:14 PM

Subject: Re: USC

Donna,

You were so awesome in those meetings with Can't say enough about how important you were to this windfall. Many thanks.

Sent from my iPhone

On Apr 22, 2014, at 11:41 AM, "Donna Heinel" < dheinel@usc.edu > wrote:

Yahoooooo

Sent from my iPhone

On Apr 22, 2014, at 11:12 AM, "Pat Haden" < pchad@usc.edu > wrote:

Chris, congratulations on this gift! The largest ever for our golf program!

Sent from my iPhone

Begin forwarded message:

From:

**Date:** April 22, 2014 at 10:11:35 AM PDT **To:** "Patrick C. Haden" pchad@usc.edu>

Subject: Fwd: USC

Dear Pat

I was trying to call you yesterday to commit that I will make 3m usd donation to USC which will divide into a million for an endowment of golf scholarship and another two million dollars for athletic department for golf development or other items deem necessary for USC athletic program. I will make the donation within June 14 so it will fall within this fiscal year. I will review the location of name right that was sent to me and will get back to

Thank you for your arrangement to set up an interview for and Tim at the admission office. Please use this email for our communication because the other one is an alternative email not the main one. I hope to see you again soon and hopefully you can make a visit to and possibly attending my in Deember.

Begin forwarded message:

From: Pat Haden <pchad@usc.edu>

Date: To:

Subject: RE: USC

pursuant to your request, I have attached a file of some recent "naming gifts" and their donation amount. As you can see, they range from \$8 million to \$1 million. What I believe makes sense for your \$2 million gift (over and above the \$1 million for endowment that seems to be ok with you) is to name the entire first floor in your name (or as you designate). This area, which you have visited, includes the golf offices, practice area, nutrition station, classroom, and locker rooms. It is quite a large space as it should be for \$2 million. As I have told you, you would become our largest golf benefactor in history with such a gift. This will be great for our golf program and Coach Zambri.

I hope this meets your satisfaction. We are most appreciative of your generosity. Further, by giving us the entire \$3 million in June, it will be counted in our current fiscal year and be a tremendous boast for our entire athletic department. Many thanks.

----Original Message----

From:

Sent: Wednesday, April 09, 2014 10:59 AM

To: Pat Haden Subject: USC

Dear Pat

It was nice meeting with you again at the campus, I do appreciate your setting up an interview and all the assistance for my son.

I will leave for Bangkok tomorrow but will stop by Japan for my business for a week there.

I'm pleased to be part of the support to your athletic department and the golf program at USC, Chris is a good guy that I feel got a passion for the school, the sport and a good caring character as a head coach for young kids who would pursue their future whether as a golfer or in the business

Case 1:19-cr-10080-NMG. Document 2306-1. Filed 09/28/21 Page 4 of 36 world. I have met with several famous golfers and agents throughout the world and he is one of the person that I personally admired and comfortable with to guide and look after my son when he comes to USC. On the supporting side, only two issues remain that we will need to clear up which is one from my side related to tax in the state of California which I dont really see as the problem and the other will be from your side the name right value for an additional 2m that you will send me some of the potential locations. Please keep in touch and I hope to see you soon, if by any chance you come to please let me know. Also please make yourselves available to attend my in December. As I mentioned to you briefly that I have a close nephew applying for a graduate program for the Marshall school of business, her name is : I appreciate if you can help check the status of her applications and if it stands a good chance. Thank you for all the help and hope to you again soon, Disclaimer:-

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<Lead Capital Gifts and Pricing xlsx>

## Case 1:19-cr-10080-NMG Document 2306-1 Filed 09/28/21 Page 5 of 36

From: Pat Haden </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4DF3787A33B14662B16CB977D37D9C9E-

SCDV6DW2>

To: Donna Heinel

**Sent:** 1/27/2015 10:26:49 AM

Subject: Re:

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Ok. Get to work!!

Sent from my iPhone

> On Jan 27, 2015, at 7:02 AM, "Donna Heinel" <dheinel@usc.edu> wrote:

> We review him on Thursday I asked Chris for fall grades. He will get them to me today. He is also on your VIP list. Let's sit tight until we see grades and represent on Thursday.

> Sent from my iPhone

> On Jan 27, 2015, at 6:57 AM, "Pat Haden" <pchad@usc.edu> wrote:

> Sent from my iPhone

kid in. What do I do?

> Sent from my iPhone
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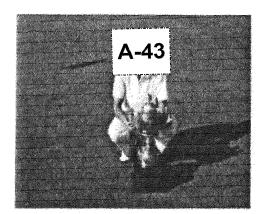
# Case 1:19-cr-10080-NMG Document 2306-1 Filed 09/28/21 Page 6 of 36

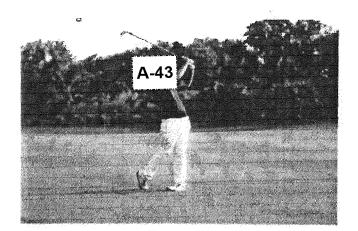
Date: 1/14/15 Major:	
Name: <b>A-43</b>	
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OC 1/15/15	
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A-43

USC Class of 2019





A-43 is the prototypical non-scholarship player that we are always looking to add to our roster. He is a talented player with the potential to develop into a major contributor to the team. In addition, A-43 and his family operate an extremely important event in that annually attracts the best golfers in the world. Golf popularity is growing rapidly in Asia and it will be critical for our team to establish and maintain relationships that will help us identify the best players. A-43 is a talented golfer who will help the team win championships, while also bringing a needed connection to the growing talent pool on the Asian continent.

- Ranked number 1545 in Official World Golf Ranking
- Won NIST Golf Tournament with an even par 72
- RBSC Champion with scores of 67-70
- Advanced to match play at the Bobby Bowers Memorial with an even par 72
- · Advanced to match play at the St. Andrews Boys Championship with a 74
- Finished 3<sup>rd</sup> at the 2010 True Visions Junior Golf Championship with 77-77
- Shot 76 in the Queens Cup on the Asian Tour

TROJAN GOLF

University of Southern California • 3501 Watt Way, Heritage Hall, Suite 104 • Los Angeles, California 90089-0602 • (213) 740-0687 • Fax: (213) 740-5777 • www.usctrojans.com

Alex Garfio	Al	ex	G	а	rfi	O
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From: Sent: David Chong <a href="mailto:hiuchong@usc.edu">hiuchong@usc.edu</a> Tuesday, January 13, 2015 2:32 PM

To:

Alex Garfio

Subject:

**RE:** Golf Prospect from

Hi Alex,

I think it will be easier if we take the average of all the scores instead of assigning letter grades individually since the school does not assign credits for the coursework.

Case 1:19-cr-10080-NMG Document 2306-1 Filed 09/28/21 Page 14 of 36

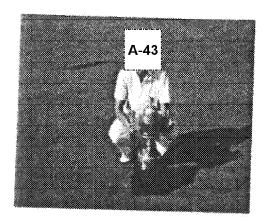
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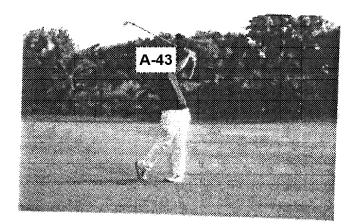
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SAT: CRM_ WR	ACT: CompositeWritten
NCAA Cleaninghouse Approved Courses:	
English Math Science	FLan g Social Science
English Math Science  SUBCO Comment/Interview	FLan g Social Science Athletic Accomplishment
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SUBCO Comment/Interview  SCP - CA 13  CAR 1-29-15  AUB 1/29/15  Pel C 414/15  OUS 1/29/15	Athletic Accomplishment



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## **Alex Garfio**

From:

David Chong <a href="mailto:hiuchong@usc.edu">hiuchong@usc.edu</a>

Sent:

Tuesday, January 13, 2015 2:32 PM

To:

Alex Garfio

Subject:

RE: Golf Prospect from

Hi Alex,

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#### Case 1:19-cr-10080-NMG Document 2306-1 Filed 09/28/21 Page 24 of 36

From: David Park [davidmpa@usc.edu]

Sent: 1/26/2015 9:46:16 AM

To: Alex Garfio [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=29cb55f623344a6ebec3077d4018f857-scfs5kd9]

Subject: RE: A-43 MGOL

Hi Alex,

A-43 is a student at best. I know this school very well and visit it every year.

First, the school is using a very generous grading scale. Our interpretation of IB scores are:

A=7-6, B=5, C=4, D=3, F=<2

#### Thanks,

#### **David Park**

Associate Director, Undergraduate Admission University of Southern California Los Angeles, California, USA

☑ davidmpa@usc.edu

1.213.740.7449 1 USC

From: Alex Garfio [mailto:garfio@usc.edu] Sent: Monday, January 26, 2015 9:21 AM

To: David Park

Subject: A-43 , MGOL

Importance: High

Hi David,

Hope you're doing well.

We presented A-43 from to the athletic admission sub-committee last week. Becky and Aaron wanted me to shoot his info over to you to see if you could contribute some notes about his record to help them with their decision. A-43 is a high caliber golfer who is willing to walk on to our golf team. We are planning on presenting him at this Thursdays meeting. Any input would be greatly appreciated.

Please let me know if you need more information.

Thank you.

#### **Alex Garfio**

Assistant Athletic Director Director of Admissions & Initial Eligibility USC Department of Athletics Phone: (213) 740-5326 Fax: (213) 740-1306

garfio@usc.edu



### 

From: Donna Heinel </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2BF62813E2894234A74A0DFD90C81487-

SCHV8RH5>

To: Tim Brunold

**Sent:** 1/26/2015 2:25:26 PM

Subject:

Attachments: PatVIPList.xlsx

#### Tim,

As the pressure mounts, Pat would like to humbly submit his requests for admissions. He personally knows and highly recommends all of these individuals for Fall admission to USC. This is a comprehensive and complete list. As always thank you for everything that you do for us, Pat is forever appreciative.

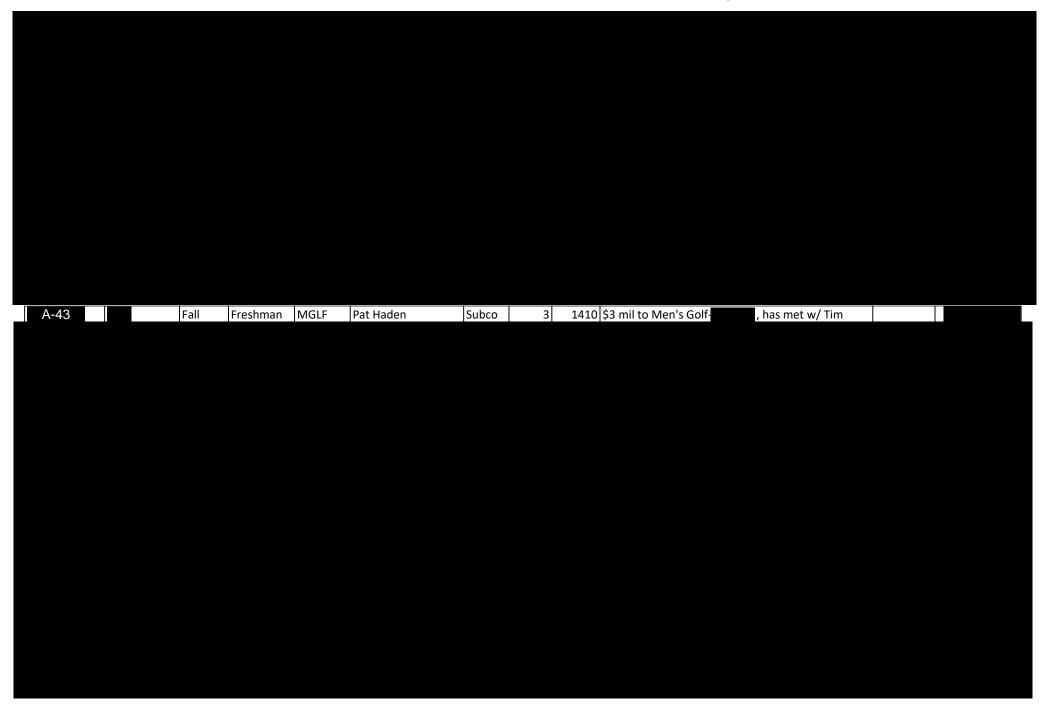
Donna C. Heinel Ed.D Senior Associate Athletic Director/SWA Associate Professor-Rossier School of Education University of Southern California

United States District Court
District of Massachusetts

TRIAL EXHIBIT

1085

Case No. 19-CR-10080-NMG

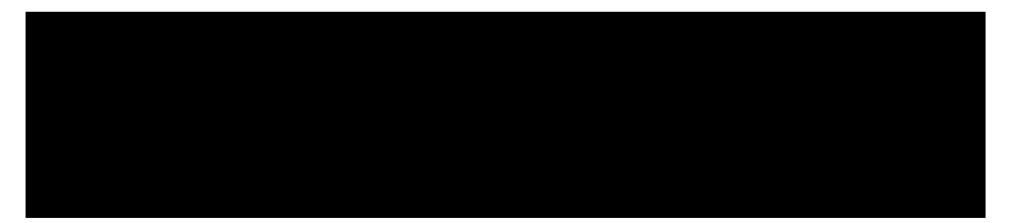




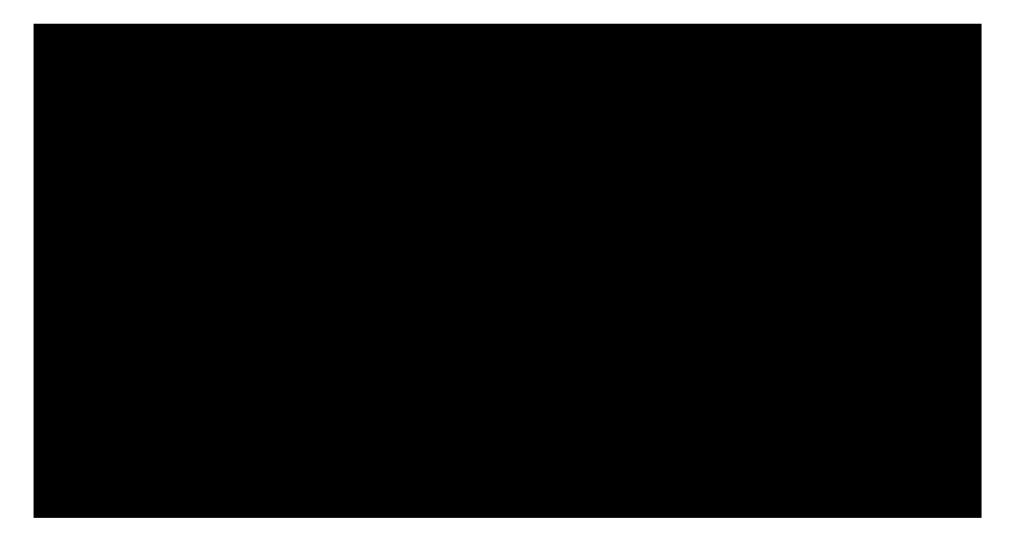














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From: Christopher Zambri </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F72E8103D1E046BB877103A8D926EFCD-

SCHG7VW6>

To: Donna Heinel

**Sent:** 7/14/2015 11:59:22 AM

Subject: RE: roster

#### Donna,

This is a workable number. I have been seeking an exemption for as he will be on our team for next year but I don't think there is any way he will contribute to us winning or losing. To remind, his dad is now a huge supporter of USC Athletics who wants his kid on our team. I have discussed this with JK.

Chris Zambri
Head Men's Golf Coach USC
Email – <u>zambri@usc.edu</u>
Cell- 805-312-1516
Fax – 213-740-5777

University of Southern California 3501 Watt Way, Heritage Hall Los Angeles, CA, 90089-0602 WWW.USCtrojans.com

From: Donna Heinel

Sent: Monday, July 13, 2015 3:15 PM

To: Christopher Zambri

Cc: Scott Simon; David M. Roberts; Bradley T Boswell; John Mckay

Subject: roster

#### Chris.

Per our discussions, we have set your roster at 10 student-athletes. Please let me know if there are any issues and that if this is a workable number for you for next year and years to come.

Also you have 0 unused scholarship for this current year. Thank for your cooperation.

#### Donna C. Heinel Ed.D

Senior Associate Athletic Director/SWA Associate Professor-Rossier School of Education University of Southern California

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